

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KASONDRA KAYE GRANT,

Defendant.

Case No. 1:20-cr-075-02

Case No. 3:20-cr-042-18

**UNITED STATES' RESPONSE TO
MOTION FOR PRETRIAL
RELEASE**

The United States of America, by Drew H. Wrigley, United States Attorney for the District of North Dakota, and Rick L. Volk, Assistant United States Attorney, submits this response to the Defendant's Motion for Pretrial Release wherein the Defendant requests this Court allow her to attend residential substance abuse treatment at Springboard Recovery in Scottsdale, Arizona. The United States does not object to such release provided the Court imposes conditions upon such release and requires provision of certain information to the United States Pretrial Services Office prior to any release.

Prior to release, the United States requests this Court require the Defendant provide a travel itinerary to the United States Pretrial Services Office, including the identity and contact information for the individual(s) Defendant proposes to transport her from her current detention facility to the airport, and obtain the approval from that Office for that itinerary and transport by that / those individual(s). The United States further requests the Court order the Defendant to immediately report any changes in her travel itinerary to the United States Pretrial Services Office through and until her arrival at SpringBoard Recovery.

Upon release, the United States requests the Court's order include the following conditions of supervision while on release:

1. The Defendant shall not violate federal, state, tribal or local law while on release;
2. The Defendant shall appear in court as required and surrender for any sentence imposed;
3. The Defendant shall report to the Pretrial Services Office at such times and in such manner as designated by the supervising officer;
4. The Defendant shall refrain from the use of alcohol; any possession or use of a narcotic drug and other controlled substance as defined in 21 U.S.C. § 802 or state statute, unless prescribed by a licensed medical practitioner, and any use of inhalants. Defendant shall submit to drug/alcohol screening at the direction of the Pretrial Services Officer or his/her designee to verify compliance. Failure or refusal to submit to testing or tampering with the collection process or specimen may be considered the same as a positive test;
5. Defendant shall submit her person, residence, vehicle, and/or possessions to a search conducted by the Pretrial Services Officer at the request the request of the Pretrial Services Officer. Failure to submit to a search may be grounds for revocation of pretrial release. Defendant shall notify any other residents that the premises may be subject to searches pursuant to this condition;
6. Defendant shall not possess a firearm, destructive device, or other dangerous weapon;

7. Defendant shall not initiate contact with any co-defendant or witness, directly or indirectly, and shall report any contact to her supervising Pretrial Services Officer. Should any co-defendant or witness be or become a resident of the substance abuse treatment program Defendant is attending, Defendant shall immediately report the same to her supervising Pretrial Services Officer;
8. Defendant shall immediately contact the Pretrial Services Office to advise of her arrival and admission at SpringBoard Recovery. She shall reside at the SpringBoard Recovery's facility, attend and participate in its residential substance abuse treatment program, and comply with all rules and regulations imposed by the program and/or its employees;
9. Defendant shall sign all releases of information requested by the Pretrial Services Officer to monitor Defendant's progress and participation in the substance abuse treatment program and any other incidental services and programs;
10. At least four days before completion of, or upon termination from, the SpringBoard Recovery's substance abuse treatment program, Defendant shall contact the Pretrial Services Officer to discuss her living arrangements;
11. Upon discharge from SpringBoard Recovery's substance abuse treatment program, Defendant shall reside at a residence approved by the Pretrial Services Officer and not change this residence without permission from the Pretrial Services Officer. If the Pretrial Services Officer determines that Defendant is in need of a placement in a residential facility, Defendant shall

voluntarily report to the designated facility, comply with the facility's rules and regulations, and participate in all recommended programming. If the Pretrial Services Officer does not approve of Defendant's proposed residence and determines either that the residential facility lacks space for Defendant or that a placement of Defendant at a residential facility is inappropriate, Defendant shall report to the United States Marshal's office in Bismarck with the understanding that Defendant shall be detained pending further order of the court.

Dated: July 23, 2020.

DREW H. WRIGLEY
United States Attorney

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